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**AIR OPERATING PERMIT No. 000295-0**  
In compliance with the provisions of  
The State of Washington  
Clean Air Act Chapter 70.94 Revised Code of Washington

In compliance with the provisions of  
The State of Washington  
Intalco Aluminum Corporation is  
authorized to operate in accordance  
with the terms and conditions  
of this permit

Issued by:

State of Washington  
DEPARTMENT OF ECOLOGY  
300 Desmond Drive  
P.O. Box 47600

Approved by:

Carol Kraege, P.E.  
Industrial Section Manager

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## Section I: INTRODUCTION AND LEGAL AUTHORITY

This Air Operating Permit is issued under the procedures established in the Operating Permit Regulation, Chapter 173-401 WAC (Washington Administrative Code). The provisions of this permit describe the emissions limitations, operating requirements, emission monitoring, record keeping requirements, and reporting frequencies for the permitted source.

Intalco Aluminum Corporation (Intalco) requires a Chapter 173-401 WAC Air Operating Permit because Intalco emits or has the potential-to-emit, one hundred tons per year or more of one or more air pollutants as evidenced by Intalco's annual emission inventories and monthly air emission reports [WAC 173-401-300(1)].

Terms used in this permit have the meaning assigned to them in the referenced regulations. The definitions of terms contained in WAC 173-401-200, and as defined in all referenced regulations, apply to this permit unless otherwise defined in the permit.

All terms and conditions except state-only requirements are enforceable under the Federal Clean Air Act (FCAA). State-only requirements are specifically identified in the permit.

## Section II: SPECIFIC TERMS AND CONDITIONS OF THE PERMIT

The permittee is subject to the respective requirements in each of the tables for the specific processes (Table A - G) and is also subject to all of the facility-wide generally applicable requirements (Table H). Insignificant emission units (IEUs) and activities are subject to the applicable requirements contained in the facility-wide generally applicable requirements (Table H), however, they are not subject to testing, monitoring, recordkeeping, reporting and certification requirements unless the generally applicable requirements in the State Implementation Plan (SIP) impose them [WAC 173-401-530(2)(c)].

During periods of total facility curtailment (100% of smelting operations are shut down), monitoring, inspections, and recordkeeping requirements can be discontinued if the permittee makes a contemporaneous record in a log or file maintained on site of the date and time of total facility curtailment. The permittee must provide a written notice to Ecology of the date of total curtailment in the subsequent monthly air monitoring report. Reporting requirements shall remain in effect. Upon start-up of the curtailed smelting operations, all requirements in this permit shall come back into effect. Intalco is not required to conduct source tests on emission units that are shutdown due to a curtailment of potroom operations. Intalco is required to resume the pre-curtailment monitoring schedule in accordance with the permit conditions when operations are started again. For emission units subject to a source test frequency of every 2 years or greater, the commencement of monitoring after startup shall be approved by Ecology.

Process Specific Applicable Requirements: This permit categorizes permit conditions according to Intalco's aluminum smelter processes: green carbon, baked carbon, anode rodding, potroom operation, metal products, ancillary, and maintenance permit conditions are contained in Tables A through G respectively. The emission units identified in Tables A - G are the emission units that are subject to specific requirements in addition to the generally applicable facility-wide requirements in Table H. Tables A through H are configured with a heading identifying the name of the process and with six columns titled Emission Unit; Pollutant/Parameter; Requirement; Monitoring, Reporting and Record-keeping; and Basis of Authority. In cases where an emission unit is subject to a number of similar requirements, the citation for the most stringent of those requirements is listed first in column 6 (Basis of Authority) followed by the less stringent (or less specific) citations listed below it (typed in italicized font) [per WAC 173-301-600].

WAC 173-401-615 (1) of Ecology's Operating Permit Regulation states that the AOP must fulfill the following requirement with respect to monitoring: "(1) Monitoring. Each permit shall contain the following requirements with respect to monitoring: (b) Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, as reported pursuant to subsection (3) of this section. Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of this paragraph;". WAC 173-401-630 (1) of Ecology's Operating Permit Regulation states that the AOP must fulfill the following requirement with respect to compliance: "Consistent with WAC 173-401-615, all chapter 401 permits shall contain compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit." The addition of these requirements is called "gapfilling". Ecology has added gapfilling requirements (monitoring, recordkeeping, and reporting requirements to assure compliance with the conditions of the AOP) that are authorized under WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements). The authority for the "gapfilling" requirements is distinguished in the AOP from the authority for applicable requirements that were established in approval orders issued by Ecology.

II A GREEN CARBON					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
188 Paste Plant Baghouse Stack (19,000 acfm)	A 1	Particulate Matter (PM)	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and A11.	WAC 173-400-060; WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	A 2	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and A11.	See Condition H3.a.
189 Phase "A" Ball Mill Baghouse (10,000 acfm)	A 3	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and A11.	Same authority as for Condition A1.
	A 4	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and A11.	See Condition H3.a.
191 Phase "B" Ball Mill Baghouse (10,000 acfm)	A 5	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and A11.	Same authority as for Condition A1.
	A 6	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and A11.	See Condition H3.a.
194 Petroleum Coke Baghouse Stack (7,500 acfm)	A 7	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.e and A11.	See Condition H2.e
	A 8	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and A11.	See Condition H3.a.
232 Spent Anode Crusher Baghouse (18,000 acfm)	A 9	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.e and A11.	See Condition H2.e
	A 10	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and A11.	See Condition H3.a.
188 Paste Plant Baghouse Stack, 189 Phase "A" Ball Mill Baghouse, , 191 Phase "B" Ball Mill Baghouse, 194 Petroleum Coke Baghouse Stack, 232 Spent Anodes Baghouse.	A 11	Functional Integrity	Inspection	Intalco shall comply with Condition H4.a.	See Condition H4.a

II A GREEN CARBON (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
316 Pitch Fume Treatment System (50,000 acfm)	A 12	PM <sub>10</sub>	Emissions of PM <sub>10</sub> shall not exceed 2.36 pounds per hour [Per Order No. 02AQIS-3967]. Emissions of PM shall not exceed 0.1 gr/dscf [Per WAC 173-400-060; WAC 173-401-615(1)(b), WAC 173-401-615(2)(a); and WAC 173-401-630(1)].	Intalco shall comply with Conditions H1, H2.b, and A 15.	Order No. 02AQIS-3967 WAC 173-400-060; WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	A 13	Opacity	Opacity shall not exceed 5% for more than six consecutive minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.b, and A 15.	
	A 14	Polycyclic Organic Matter (POMS excluding napthalene)	Emissions of POM shall not exceed 0.54 lbs per hour	Intalco shall conduct a source test once every two years and upon Ecology's request using EPA RM 315 as per 40 CFR 63, Appendix A, or another EPA approved method. Intalco shall submit the test report to Ecology within 90 days of the date of the test. Intalco can reduce the frequency of source testing to once every 5 years if condition H6 is met. Intalco shall comply with Conditions A15 and H14.	
	A 15	Functional Integrity	Inspection	Intalco shall comply with Condition H4.b.	
	A16	Operation and Maintenance (O&M) Manual	O&M Manual	Intalco shall develop, follow, and update an O&M manual. The O&M manual shall include the certification required under 40 CFR 63.843(b) and parametric monitoring in accordance 40 CFR 63.848(f)(1).	

**II A GREEN CARBON (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
316 Pitch Fume Treatment System (50,000 acfm)	Conditions A17 through A 24 incorporate MACT requirements published at FR52384 October 7, 1997				
	A 17	POM	Operate and maintain equipment to capture and control POM emissions.	Intalco shall comply with conditions A 17 through A 19.	40CFR63.843(b)
	A 18	Parametric monitoring	Operate, calibrate and maintain a continuous parameter monitoring system including, at a minimum, coke flow and air flow. Submit for approval the average coke feed rate which shall be maintained for each operating shift. Submit for approval the average air flow rate which shall be maintained for each operating shift.	Intalco shall monitor and maintain a log of coke feed and air flow rates. Intalco shall maintain records onsite and make them available to Ecology on request. Intalco shall submit a semiannual summary report of the parametric monitoring inspection results to Ecology.	40CFR63.848(f) and 40CFR63.847(h)
	A 19	VE	Visually inspect the exhaust stack(s) of each control device for evidence of any VE indicating abnormal operation.	Intalco shall conduct daily VE inspections (Method 9 is not required) and record the results.	40CFR63.848(g)
	A 20	Corrective Action	Intalco shall initiate the corrective action procedures identified in the current version of the startup, shutdown and malfunction (SSM) plan within 1 hour if a monitoring device measures an operating parameter outside the limit(s) established pursuant to § 63.847(h) or if VE indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection. Intalco shall comply with the SSM plan. Failure to initiate the corrective action within 1 hour or to take the necessary corrective actions to remedy the problem is a violation.	Intalco shall maintain records of all instances of failure to initiate corrective action procedures within 1 hour or to take necessary corrective actions to remedy the problem.	40CFR63.848(h)
	A 21	Exceedances	If the limit for a given operating parameter associated with monitoring a specific control device (per condition A18) is exceeded six times in any semiannual reporting period, then any subsequent exceedance in that reporting period is a violation. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed in any given 24-hr. period.	Intalco shall record all exceedances of the limits for operating parameters.	40CFR63.848(i)
	A 22	Accuracy and calibration	All monitoring devices required by condition A 18 [40CFR63.848] must be certified by Intalco to meet the accuracy requirements and must be calibrated in accordance with manufacturer's instructions.	Intalco shall submit any changes to monitoring devices that affect their accuracy to Ecology for review and approval.	40CFR63.848(k)
	A 23	Excess Emissions report		Intalco shall submit a semiannual excess emissions report, containing information specified in 40CFR63.10(e)(3)(v), if measured emissions exceed the applicable standard unless quarterly reports are required as a result of excess emissions.	40CFR63.850(d) and 40CFR63.10(e)(3)
	A 24	File Maintenance		Intalco shall maintain files of all information, reports and notifications required by 40CFR63.10(b) and 40CFR63 Subpart LL in accordance with 40CFR63.850(e) for a minimum of 5 years.	40CFR63.850(e) and 40CFR63.10(b)

II A BAKED CARBON					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
187 Bake Oven Baghouse (100,000 acfm)	B 1	PM	When added to the total PM emissions from the primary and secondary potline control systems, PM emissions from the bake oven baghouse shall not exceed the PM limits in Conditions D6 and D7 [Per Order No. 02AQIS-3967]. Emissions of PM shall not exceed 0.1 grains/dscf [Per WAC 173-400-050(1); WAC 173-401-615(1)(b), WAC 173-401-615(2)(a); and WAC 173-401-630(1)].	Intalco shall determine and demonstrate compliance with the PM limits by conducting a source test once per year and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall report the grainloading concentration (grains/dscf) for the bake oven baghouse and Intalco shall report the monthly average of the combined total pounds of PM per day and the 3-month average of the combined total pounds of PM per ton of aluminum produced from the bake oven baghouse and the potlines (per Conditions D6 and D7) in the respective monthly air monitoring report submitted to Ecology. Intalco shall comply with Conditions H1, H14, and B5.	Order No. 02AQIS-3967 WAC 173-400-050(1); WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	B 2	TF	Emissions of TF from the bake ovens when added to the total TF emissions from the primary and secondary potline control systems shall not exceed the TF limits in Conditions D11 and D12.	Intalco shall determine and demonstrate compliance with the TF limits by conducting a source test on the bake oven baghouse 3 times per year using Alcoa Methods 4075A and 4046A. Intalco shall report the monthly average of the combined total pounds of TF per day and the 3-month average of the combined total pounds of TF per ton of aluminum produced from the bake oven baghouse and the potlines (per Conditions D11 and D12) in the respective monthly air monitoring report submitted to Ecology. Intalco shall comply with Conditions H1, H14, and B5.	Order No. 02AQIS-3967
	B3	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and B5.	See Condition H3.a.
	B4	SO2	SO2 concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with condition H 1, H 8 and B5.	Defined in Condition H8.
	B5	Functional Integrity	Inspection	Intalco shall comply with Condition H4.a.	Defined in Condition H4.a.

II B BAKED CARBON (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
187 Bake Oven Baghouse (100,000 acfm)	Conditions B6 through B 15 incorporate MACT requirements published at FR52384 October 7, 1997				
	B6	TF	Shall not exceed 0.20 lb/ton of green anode placed in the anode bake furnaces.	Intalco shall conduct source tests in accordance with the approved test plan at the exhaust stack using Alcoa Method 4075ATF/4076TF. Intalco shall compute and record the annual average of all valid test runs ( a minimum of three test runs) each year to determine compliance, using equation 2 in 40CFR63.847(e)(3). Intalco shall submit test results each year in accordance with Condition H14.	40CFR 63.843(c)(1), 847(d), 848(c), 849, 850(a)(5) and b, 40CFR 63.7(b) and (g)
	B7	POM	Shall not exceed 0.18 lb/ton of green anode placed in the anode bake furnaces.	Intalco shall conduct source tests in accordance with the approved test plan at the exhaust of module A-446 using Alcoa Method 4075ATF/4076TF. Intalco shall compute and record the annual average of all valid test runs ( a minimum of three test runs) each year to determine compliance, using equation 2 in 40CFR63.847(e)(4). Intalco shall submit test results each year in accordance with Condition H14.	40CFR 63.843(c)(2) 847(d), 848(c), 850(a)(5) and b, 40CFR 63.7(b) and (g)
	B8	Parametric Monitoring	Operate, calibrate, and maintain a continuous parameter monitoring system including, at a minimum, alumina flow and air flow. Submit for approval the average ore flow rate into each reactor which shall be maintained. Submit for approval the average air flow rate from the baking furnace which shall be maintained.	Intalco shall inspect each control device to ensure the control device is operating properly and record the results of each inspection. Intalco shall monitor and maintain a log of ore feed and air flow rates. Intalco shall maintain records onsite and make them available to Ecology upon request. Intalco shall submit a semiannual summary report of the parametric monitoring inspection results to Ecology.	40CFR63.848(f) and 40CFR63.847(h)
	B9	Visible Emissions (VE)	Visually inspect the exhaust stack of each control device for evidence of any VE indicating abnormal operation.	Intalco shall conduct daily VE inspections (EPA RM 9 is not required) and record the results.	40CFR63.848(g)
	B 10	Corrective Action	Intalco shall initiate the corrective action procedures identified in the startup, shutdown and malfunction (SSM) plan (per Condition B14) within 1 hour if a monitoring device measures an operating parameter outside the limit(s) established pursuant to § 63.847(h) or if VE indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection. Intalco shall comply with Condition B13 (SSM plan). Failure to initiate the corrective action within 1 hour or to take the necessary corrective actions to remedy the problem is a violation.	Intalco shall maintain records of all instances of failure to initiate corrective action procedures within 1 hour or to take necessary corrective actions to remedy the problem.	40CFR63.848(h)



II B BAKED CARBON (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
187 Bake Oven Baghouse (100,000 acfm)	B 11	Exceedances	If the limit for a given operating parameter associated with monitoring a specific control device is exceeded six times in any semiannual reporting period, then any subsequent exceedance in that reporting period is a violation. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed in any given 24-hr. period.	Intalco shall record all exceedances of the limits for operating parameters.	40CFR63.848(i)
	B 12	Green anode material weight	Intalco shall operate and maintain a monitoring device to determine the daily weight of green anode material by measuring the weight of all anodes or by monitoring the number of green anodes placed in the furnace and determining an average weight from measurements of a representative sample of anodes.	Intalco shall record the monthly average weight of anodes placed in each furnace in tons, to calculate the daily weight of anodes placed in each furnace in tons. Per approved Parameter Monitoring Plan.	40CFR63.848(j)
	B 13	Accuracy and calibration	All monitoring devices required by condition B8 must be certified by Intalco to meet the accuracy requirements and must be calibrated in accordance with manufacturer's instructions.	Intalco shall submit any changes to monitoring devices that affect their accuracy to Ecology for review and approval.	40CFR63.848(k)
	B 14	Excess Emissions Report		Intalco shall submit an excess emission report semiannually containing information specified in 40CFR63.10(e)(3)(v), if measured emissions exceed the applicable standard unless quarterly reports are required as a result of excess emissions.	40CFR63.850(d) and 40CFR63.10(e)(3)(v)
	B 15	File Maintenance		Intalco shall maintain files of all information, reports and notifications required by 40CFR63.10(b) and 40CFR63 Subpart LL in accordance with 40CFR63.850(e) for a minimum of 5 years.	40CFR63.850(e) and 40CFR63.10(b)
251 Anode Bake Building Roof Vents	B16	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and B19.	Same authority as for Condition A1
	B17	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and B19.	See Condition H3.a.
	B18	SO2	SO2 concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with condition H 1 and H8.	See Condition H8.
	B19	Functional Integrity	Inspection	Intalco shall comply with condition H4.c.	See Condition H4.c

II C ANODE RODDING					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
198 Rodshop Baghouse (West) (50,000 acfm)	C1	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.c and C5.	See Condition H2.c
	C2	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and C5.	See Condition H3.a.
199 Rodshop Baghouse (East) (50,000 acfm)	C3	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.c and C5.	See Condition H2.c
	C4	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and C5.	See Condition H3.a.
198 Rodshop Baghouse (West), 199 Rodshop Baghouse (East),	C5	Functional Integrity	Inspection	Intalco shall comply with condition H4.a.	See Condition H4.a
253 Rod Shop Building Roof Vents North	C6	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and C8.	Same authority as for Condition A1
	C7	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and C8.	See Condition H3.a.
	C8	Functional Integrity	Inspection	Intalco shall comply with condition H4.c.	See Condition H4.c

II D POTLINES					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D1	Aluminum Production	Net potline production of aluminum shall be limited to $\leq 307,000$ tons of aluminum per calendar year. Net production of aluminum is the total mass of molten metal produced from tapping all pots in all operating potlines, measured at the casthouse scales and the rod shop scales.	Intalco shall maintain a record of the daily net production of aluminum and report the average daily net aluminum production in the monthly air monitoring report that is submitted to Ecology per Condition H14.	Order No. DE 02AQIS-3967
	D2	Operational Limits	The following limits shall not be exceeded : <ul style="list-style-type: none"> <li>Operating <math>\leq 720</math> pots/day</li> <li>3.0 % sulfur in coke</li> <li>0.6 % sulfur in pitch</li> <li>91.25 % current efficiency</li> <li>150,000 amps of current</li> <li>0.4250 carbon consumption ratio (pounds of carbon consumed per pound of Aluminum produced).</li> </ul>	Intalco shall maintain a record of the data collected for the parameters below, compute the monthly average, and report the monthly average (unless another average is noted below) for each parameter in the respective monthly air monitoring report submitted to Ecology per Condition H14: <ul style="list-style-type: none"> <li>Number of pots operated per day (potdays)</li> <li>Percent sulfur in pitch (Intalco shall analyze each incoming load or batch of pitch for sulfur content using the procedures in ASTM D4239 or other ASTM sulfur methods)</li> </ul>	Order No. DE 02AQIS-3967
				<ul style="list-style-type: none"> <li>Percent sulfur in coke (Intalco shall analyze each incoming load or batch of coke for sulfur content using the procedures in ASTM D4239 or other ASTM sulfur methods)</li> <li>Percent sulfur in baked anode as a weekly composite of anode core samples</li> <li>Current Efficiency</li> <li>Carbon consumption ratio as a daily average computed monthly</li> <li>Amperes of current</li> </ul>	Order No. DE 02AQIS-3967
				<ul style="list-style-type: none"> <li>Average number of days per pot to complete a pot relining</li> <li>Total pounds of aluminum sent to cast house per day</li> </ul>	
	D3	"Water Off" (periods when the secondary control system roof scrubbers are turned off due to potential freezing conditions) emission limits and conditions are covered under WAC 173-415-030(6).	All of the limits and conditions in Conditions D1 through D26 were developed for "water on" conditions. Water Off emission limits and conditions are covered under WAC 173-415-030(6) until Ecology issues an order with new conditions. Intalco shall follow the procedures specified in the current version of the Startup Shutdown and Malfunction Plan to determine when shutdown is necessary, and when the roof scrubbing system can be safely started again. During these periods where the scrubbers continue to operate, but conditions prohibit safe roof access, Intalco will not conduct source testing of the roof scrubbers.	Intalco shall notify Ecology that the roof scrubbers are going to be shut off. Intalco shall use all tests conducted over the calendar month to demonstrate compliance. For potlines where less than the required three tests were completed in the calendar month according to the schedules specified in the approved Air Monitoring Plan per Condition H15, data from the preceding 24 months shall be substituted. The average and standard deviation of all roof scrubber tests shall be computed from the data set of each potline. The average plus two standard deviations will be used for all tests that could not be run. Intalco shall report the average of all actual tests run during the compliance period and the values obtained from the average and standard deviations described above as the roof emissions for each potline in the respective monthly air monitoring report submitted to Ecology.	Order No. DE 02AQIS-3967

II D POTLINES (continued)					
Emission Unit	Condition No.	Pollutant	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D4	PM	Emissions of PM from potrooms shall not exceed 0.1 grains/dscf.	Intalco shall determine and demonstrate PM compliance with the the PM limit of 0.1 grains/dscf by complying with the the monitoring, recordkeeping, and reporting requirements in Condition D6 and Intalco shall comply with Conditions D17, D18, and D19.	WAC 400-050(1) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	D5	PM	The total emissions of PM to the atmosphere from the reduction process (potlines) shall be reduced to the lowest level consistent with reasonably available control technology (RACT). Emissions of PM shall not exceed fifteen (15) pounds of PM per ton of aluminum produced on a daily basis.	Intalco shall determine PM emissions and demonstrate compliance with the the PM limit of 15 lb/ton of Al produced by complying with the 6.0 lb PM/ton Al limit and the monitoring, recordkeeping, and reporting requirements in Condition D7. A demonstration of compliance with the 6.0 lbPM/ton Al limit in Condition D7 will be considered a demonstration of compliance with this less stringent 15lbPM/ton Al limit. Intalco shall comply with Conditions D17, D18, and D19.	WAC 415-030(2) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	D6	PM	Emissions of PM shall not exceed a combined total of 5050 pounds per day (calculated on a monthly average) from the potlines (primary and secondary control systems) and the bake ovens.	Intalco shall determine PM emissions and demonstrate compliance with the PM limits in Conditions D4 through D7 by source testing the primary control systems of potlines A, B, and C (4 cells per month per potline [2 cells from each of 2 baghouse centers]) using Alcoa Method B-54 or another EPA approved method for a minimum of 24 hours and by sampling the secondary control systems of potlines A, B, and C using Alcoa Method B-54b (three roof scrubbers simultaneously three times per month per potline). Intalco shall report the results of the source tests conducted in compliance with Conditions D4 through D7 in the respective monthly air monitoring report submitted to Ecology per condition H14.	Order No. DE 02AQIS-3967
	D7	PM	Emissions of PM shall not exceed a combined total of 6.0 pounds per ton of aluminum (calculated on a three month average) produced from the potlines (primary and secondary control systems) and the bake ovens.	Intalco shall comply with Conditions D17, D18, D19, and H14.	

II D POTLINES (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D8	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H3.a, D17, D18, and D19.	See Condition H3.a.
	D9	Total Fluoride (TF)	Emissions of TF shall not exceed a combined total of 1,350 pounds per day (calculated on a one month average) from the potlines (primary and secondary control systems) and the bake ovens.	<p>Intalco shall determine representative TF emissions from the potline primary control system by conducting a minimum of three pairs of source tests on each operating primary control system per year (40 CFR 63.847(b)(1)) using Alcoa Method 4075A. To meet this requirement Intalco shall conduct source tests on a minimum of 8 cells in each potline in a 12 month period (4 cells from each of the 2 CDs in Potline A and 2 cells from each of the 4 CDs in Potline B and in Potline C) [40 CFR 63.847(b)(7)]. Intalco shall calculate the total primary TF emissions from each potline by multiplying the average representative emissions per stack (determined by source testing) by the number of stacks per potline.</p> <p>Intalco shall determine representative TF emissions from the potline secondary control system by conducting a minimum of three source tests simultaneously on three wet scrubbers per operating potline each month using Alcoa Method B-54b. Intalco shall determine the total secondary TF emissions by multiplying the average representative emissions per wet scrubber (determined</p> <p>by source testing) by the number of wet scrubbers per potline. Intalco shall demonstrate compliance with the TF limits in Conditions D9 and D10 by summing the total TF emissions from the primary control systems and the total TF emissions from the secondary control systems of each potline and comparing the sum to the respective limits. Intalco shall report the results of the source tests conducted in compliance with Conditions D9 and D10 in the respective monthly air monitoring report submitted to Ecology per Condition H14. Intalco shall comply with Conditions D17, D18, D19, and H14. Intalco shall conduct initial and ongoing performance tests in accordance with the approved Air Monitoring Plan per Condition H15.</p>	Order No. DE 02AQIS-3967

**II D POTLINES (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D10	TF	Emissions of TF shall not exceed a combined total of 1.6 pounds per ton of aluminum (calculated on a three month average) produced from the potlines (primary and secondary control systems) and the bake ovens.	Intalco shall determine TF emissions and demonstrate compliance with the the TF limit of 1.6 lb/ton of Al produced by complying with the the monitoring, recordkeeping, and reporting requirements in Condition D9. Intalco shall comply with Conditions D17, D18, and D19.	Order No. DE 02AQIS-3967
	D11	Sulfur dioxide (SO <sub>2</sub> )	SO <sub>2</sub> concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with Condition H8.	See Condition H8.
	D12	SO <sub>2</sub>	Emissions of SO <sub>2</sub> shall not exceed 37, 780 pounds per day (calculated on a one month average).	Intalco shall determine the SO <sub>2</sub> emitted by using the following formula: SO <sub>2</sub> emissions in lbs./day = (carbon consumption ratio)x(% sulfur in baked anodes/100)x (2 lb sulfur dioxide per lb sulfur)x(2000 pounds Aluminum per ton)x (Tons of Aluminum per day). Carbon consumption ratio (pounds of carbon consumed per pounds of Aluminum produced) Intalco shall report the monthly average of pounds of SO <sub>2</sub> per day in the respective monthly air monitoring report submitted to Ecology per Condition H14. Intalco shall maintain records of production data used to develop carbon consumption ratio and tons of aluminum produced. Intalco shall provide the records to Ecology upon request. Intalco shall comply with Condition H7.	Order No. DE 02AQIS-3967
	D13	SO <sub>2</sub>	Emissions of SO <sub>2</sub> shall not exceed 44.8 pounds per ton of aluminum produced (calculated on a three month average).	Intalco shall determine the SO <sub>2</sub> emitted by using the formula in Condition D12. Intalco shall report the three month average of the pounds of SO <sub>2</sub> per ton of aluminum in the respective monthly air monitoring report submitted to Ecology per Condition H14.	

**II D POTLINES (Continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D14	Carbon monoxide (CO)	Emissions of CO shall not exceed 236,150 pounds per day (calculated on a one month average).	Intalco shall calculate CO emissions based on current efficiency of the potlines using the following formula: Emissions of CO in pounds per day = $(100/C.E.) - 1 \times (3/2) \times (28.01/21.98) \times (\text{aluminum production}) \times (0.917)$ . C.E. = Current Efficiency of the potlines. 0.917 = the ratio of measured CO emissions to calculated CO emissions (Intalco's self reported empirical value). Intalco shall report the monthly average of pounds of CO per day in the monthly air monitoring report submitted to Ecology per Condition H14.	Order No. DE 02AQIS-3967
	D15	CO	Emissions of CO shall not exceed 280 pounds per ton of aluminum produced (calculated on a three month average).	Intalco shall determine CO emissions and demonstrate compliance with the 280 lb CO/ton Al limit by using the method described in Condition D14. Intalco shall report the three month average of the pounds of CO per ton of aluminum in the monthly air monitoring report submitted to Ecology per Condition H14.	
	D16	Nitrogen oxides (NOx)	Emissions of NOx shall not exceed 590 pounds per day (calculated on a one month average).	Intalco shall determine the NOx emitted by using the AP-42 emission factor of 140 lbs. of NOx per million cubic feet of natural gas consumed (as in a large natural gas combustion boiler unit). Intalco shall report the monthly average of pounds of NOx per day in the monthly air monitoring report submitted to Ecology per Condition H14.	
	D17	Primary Control System Functional Integrity	Inspection	Intalco shall comply with Condition H4.d.	
	D18	Secondary Control System Functional Integrity	Inspection	Intalco shall comply with Condition H4.e.	

II D POTLINES (Continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D19	Potroom O&M	Potroom O&M	<p>Intalco shall comply with Condition H1 by: D26.a) Maintaining sufficient draft in the pots to capture direct pot emissions. Intalco shall demonstrate compliance by meeting the parametric monitoring requirements in Condition D22. D26.b) Maintaining flow of fresh alumina into the inlet flow of each potline baghouse. Intalco shall demonstrate compliance by meeting the parametric monitoring requirements in Condition D22. D26.c) Maintaining records of sight glass readings and making those records available to Ecology upon request. D26.d) Checking flows on a minimum of four baghouse cells each month. During this process, Intalco shall readjust the damper position, remeasure the flow, and mark the correct damper position on the stack if the flow from a baghouse cell exceeds the established maximum flow rate for that cell. Intalco shall provide records of these inspections to Ecology upon request.</p> <p>D26.e) Conducting weekly inspections to assure that only one hood at a time is open for anode change and tapping operations and that only two hoods are open in any 20 pot section during line breaks for all shifts and for all potlines. If Intalco observes that these practices are not being followed, Intalco shall take corrective action. Corrective action shall include, at a minimum, closing the extra open hoods immediately. Intalco shall provide records of these pot hood inspections to Ecology upon request.. D26.f) Maintaining sufficient flow of recycle water to the wet roof scrubbers. Intalco shall demonstrate compliance by meeting the parametric monitoring requirements of Condition 29. D26.g) Complying with the functional integrity inspection requirements in Conditions D17 and D18. D26.h) Conducting semi-annual "limited root cause analyses". These analyses consist of gathering Intalco staff (environmental manager, operator(s) with extensive knowledge of current potroom hood and wet scrubber conditions, potroom source testing staff, and staff who conduct the procedures which generate, m</p> <p>review, and report emissions data in the monthly air monitoring reports submitted to Ecology) to evaluate trends in the emissions data and to determine measures to minimize emissions. Intalco shall submit a summary of the findings of the "limited root cause analysis" and any measures implemented to minimize emissions in the subsequent month's air monitoring report. Intalco shall include a bar chart of "Potline Emissions" for each of the respective pollutants illustrating the contributions from dry and wet scrubbers for each operating potline for that month and the previous 24 months to illustrate trends in the emissions data.</p>	Order No. DE 02AQIS-3967



**II D POTLINES (Continued)**

Conditions D20 through D29 incorporate MACT requirements published at FR52384, October 7, 1997

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D20	TF	Emissions of TF shall not exceed 1.6 lbs/ton of Al produced from each potline.	Intalco shall determine emissions of TF and demonstrate compliance with the 1.6 lb/ton of aluminum produced TF limit by complying with the monitoring, recordkeeping, and reporting requirements of Condition D9. Intalco shall determine compliance by averaging all valid source tests of potline primary control systems conducted less than one year before the compliance date for the reporting period, and all valid source tests conducted on the potline secondary control system collected during the compliance period (40 CFR 63.848(a)).	40CFR 63.843(a)(1)(iv), 847(d), 848(a), 40CFR63.849, 40CFR 63.7(b) and (g)
	D21	Audit Materials	Intalco shall request performance audit materials 45 days prior to each performance test.		40CFR 63.7(c)(4)(i)
	D22	Parametric Monitoring	Intalco shall operate, calibrate, and maintain a continuous parameter monitoring system including, at a minimum, alumina flow, air flow, and water flow. Intalco shall maintain alumina flow, air flow, and water flow rates per the approved parametric monitoring plan.	Intalco shall submit proposed changes to approved parametric monitoring plan for alumina flow and air flow rates prior to making changes in parametric limits. Intalco shall maintain records of air flow and alumina flow rates. Intalco shall report exceedances of parametric limits semi-annually. Intalco shall comply with Condition D24.	40CFR63.848(f) and 40CFR63.847(h)
	D23	VE	Visually inspect the exhaust stack(s) of each control device for evidence of any VE indicating abnormal operation.	Intalco shall conduct daily VE inspections (Method 9 is not required) and maintain records of the inspections.	40CFR63.848(g)
	D24	Corrective Action	Intalco shall initiate the corrective action procedures identified in the current version of the SSM plan within 1 hour if a monitoring device measures an operating parameter outside the limit(s) established pursuant to § 63.847(h) or if VE indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection. Intalco shall comply with the SSM plan. Failure to initiate the corrective action within 1 hour or to take the necessary corrective actions to remedy the problem is a violation.	Intalco shall maintain records of all instances of failure to initiate corrective action procedures within 1 hour or to take necessary corrective actions to remedy the problem.	40CFR63.848(h)

II D POTLINES (Continued)					
Conditions D20 through D29 incorporate MACT requirements published at FR52384, October 7, 1997					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Potlines A, B, and C primary (6 baghouse centers with varying numbers of individual stacks (emission units 181-186) combined flow = 1.75 million scfm) and secondary control systems (159 baghouse stacks (emission units 22-180) combined flow = 16 million scfm).	D25	Exceedances	If the limit for a given operating parameter associated with monitoring a specific control device is exceeded six times in any semiannual reporting period, then any subsequent exceedance in that reporting period is a violation. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed to any given 24-hr. period.	Intalco shall record all exceedances of the limits for operating parameters.	40CFR63.848(i)
	D26	Weight of Aluminum Produced	Operate and maintain a monitoring device to determine the daily weight of aluminum produced.	Intalco shall record the tons of aluminum produced daily for each potline.	40CFR63.848(j)
	D27	Accuracy and calibration	All monitoring devices required by condition D29 [40CFR 63.848] must be certified by Intalco to meet the accuracy requirements and must be calibrated in accordance with manufacturer's instructions.	Intalco shall submit any changes to recommended accuracy requirements to Ecology for review and approval.	40CFR63.848(k)
	D28	Excess Emissions Reports		Intalco shall submit an excess emission report semiannually, containing information specified in 40CFR63.10(e)(3)(v), if measured emissions exceed the applicable standards. Intalco shall submit quarterly reports if excess emissions are observed during the quarter.	40CFR63.850(d) and 40CFR63.10(e)(3)
	D29	File Maintenance		Intalco shall maintain files of all information, reports and notifications required by 40CFR63.10(b) and 40CFR63 Subpart LL in accordance with 40CFR63.850(e) for a minimum of 5 years.	40CFR63.850(e) and 40CFR63.10(b)

II E METAL PRODUCTS					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 (153,000 acfm)	E 1	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.d, and E4.	See Condition H2.d
	E 2	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and E4.	See Condition H3.a
	E3	SO2	SO2 concentration shall not exceed 1000 ppm corrected to 7% oxygen base on the average of any period of 60 consecutive minutes	Intalco shall comply with condition H 1 and H8.	See Condition H8.
	E4	Functional Integrity	Inspection	Intalco shall comply with condition H4.f	See Condition H4.f
217 Remelt Furnace	E5	Carbon monoxide (CO)	Emissions of CO shall not exceed 100 ppm of CO on a dry basis corrected to 3% oxygen from the remelt furnace stack. CO mass emission rate shall not exceed 5.5 tons for any 12 month period or 0.47 tons for any single month from the remelt furnace stack.	CO levels shall be controlled by limiting natural gas consumption and the quantities of aluminum scrap remelted (per Conditions E12 and E13) until new limits are established. CO limits and monitoring requirements will be determined based on the results of performance testing on the modified system and will be established in a new order issued by Ecology.	Order DE 04AQIS-1070
	E6	PM	PM emissions shall not exceed a concentration of 0.1 grains/dscf	PM levels shall be controlled by limiting natural gas consumption and the quantities of aluminum scrap remelted (per Conditions E12 and E13) until new limits are established.	WAC 400-173-050(1); 173-401-615(1)(b) (Periodic Monitoring); WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	E7	PM	PM emissions shall not exceed 2.5 tons for any twelve month period, or 0.22 tons for any single month from the remelt furnace stack.	Intalco shall report all PM as PM10. PM levels shall be controlled by limiting natural gas consumption and the quantities of aluminum scrap remelted (per Conditions E12 and E13) until new limits are established. PM limits and monitoring requirements will be determined based on the results of performance testing on the modified system and will be established in a new order issued by Ecology. Intalco has opted to report all PM as PM10 and to comply with the PM10 limit in Condition E8. Should Intalco decide to establish emission factors for PM and PM10 and to report PM and PM10 separately, Intalco shall develop a source test plan which describes how the emission factors will be derived.	Order DE 04AQIS-1070
	E8	PM <sub>10</sub> (particulate with a mean aerodynamic diameter of less than or equal to ten micrometers)	PM <sub>10</sub> emissions shall not exceed 1.5 tons of PM for any twelve month period, or 0.13 tons of PM10 for any single month from the remelt furnace stack.	Intalco shall submit the source test plan to Ecology for review and approval. Intalco may use the Ecology approved emission factors to report separate emission rates for PM and PM10. When reporting PM and PM10 derived from the approved emission factors, Intalco shall comply with the respective PM and PM10 limits in Conditions E7 and E8.	

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
217 Remelt Furnace (continued)	E9	Opacity	Opacity shall not exceed: E7.a) an average of 5 % for any 60 minute period and; E7.b) 20 % for more than 3 minutes in any 1 hour period, or E7.c) 5 % for more than 6 consecutive minutes in any 60 minute period.	<p>Intalco shall determine and demonstrate compliance with opacity limits by: a). Conducting weekly visible emission tests using EPA RM 9 per 40 CFR Part 60 until the COM is operational. b). Increasing the opacity monitoring (conducted per Condition 5.a) to three times per week if the opacity limits in Condition 1.f are exceeded more than once in any 7 day period. c). Installing a continuous opacity monitor (COM) on the remelt furnace stack by August 01, 2004. d). Maintaining the COM in compliance with EPA Performance Specification 1 per 40 CFR Part 60, Appendix B. If Intalco shuts down all casthouse operations prior to August 01, 2004, Intalco shall install the COM before startup of remelt operations.e). Taking corrective action if opacity exceeds any of the opacity limits. Corrective actions include but are not limited to: (a) adjusting flue residence time by adjusting charge door height; (b) reducing firing rate; (c) re-analyzing scrap for oil content; and (d) reviewing and modifying cast house work practices. Intalco shall record the date and time of each corrective action</p> <p>during the exceedance, and the actions taken to prevent future occurrences.f). Reporting all opacity exceedances, noncompliance with the requirements defined in a) through e) above, and the corrective actions taken in the respective monthly air monitoring report submitted to Ecology.</p>	Order DE 04AQIS-1070
	E10	Nitrogen oxides (NOx)	New NOx limits and monitoring requirements will be determined based on the results of performance testing on the modified system and will be established in a new order issued by Ecology.	Intalco shall control NOx levels by limiting natural gas consumption and the quantities of aluminum scrap remelted (per Conditions E12 and E13) until new NOx limits are established.	Order DE 04AQIS-1070
	E11	Modifications of the remelt furnace	Intalco shall complete the modifications on the remelt furnace system recommended in the Engineering Study submitted to Ecology on November 26, 2003 by August 01, 2004.	Intalco shall complete the modifications recommended in the engineering study submitted to Ecology on November 26, 2003 by August 01, 2004.	Order DE 04AQIS-1070
	E12	Natural Gas Consumption	Intalco shall not use more than 75,000 MMBtu of natural gas/year in the remelt furnace. This is an interim limit until source testing on the modified remelt furnace demonstrates (to Ecology's satisfaction) that restrictions on consumption of natural gas are not necessary to meet the emission limits in Conditions E5 through E8 and E10.	Intalco shall monitor, electronically record, and maintain records of the total number of cubic feet of natural gas consumed by the remelt furnace each month. Intalco shall provide the electronic records to Ecology upon request.	Order DE 04AQIS-1070

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
217 Remelt Furnace (continued)	E13	Remelted Aluminum Scrap	Intalco shall not remelt more than 45,640 tons of scrap per year in the remelt furnace. This is an interim limit until source testing on the modified remelt furnace demonstrates (to Ecology's satisfaction) that restrictions on the amount of scrap melted are not necessary to meet the emission limits in Conditions to meet the emission limits in Conditions E5 through E8 and E10.	Intalco shall monitor, record electronically, and maintain records of the total number of tons of aluminum produced by the remelt furnace per month. Intalco shall provide the electronic records to Ecology upon request.	Order DE 04AQIS-1070
	E14	O&M Manual	Intalco shall develop an O&M manual for the remelt furnace by October 29, 2004, follow it and update it as necessary for all associated equipment and work practices that may affect emissions of pollutants to the atmosphere.	Copies of the manual shall be available for review by Ecology. The O&M manual shall ensure that, at all times, including periods of abnormal operation and upset, Intalco personnel, to the extent practicable, maintain the remelt furnace, and operate and maintain air pollution control equipment associated with the remelt furnace in a manner consistent with good air pollution control practice. Emissions that result from a failure to follow the requirements of the manual may be considered proof that the equipment was not properly operated and maintained. Intalco shall follow the O&M manual and update the manual as necessary to include any changes in operation of the remelt furnace and activities related to its operation.	Order DE 04AQIS-1070
	E15	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the remelt furnace system that, at a minimum, includes a visual check for visible emissions. Intalco shall record the observations of the parameters assessed in the inspection log. Any time visible emissions are present, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log.	Order DE 04AQIS-1070

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
220a, 220b, 221a, 221b MHD Holding Furnaces (51,000 acfm)	E 16	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.f and E20	See Condition H2.f.
	E 17	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and E20	See Condition H3.a.
	E18	SO2	SO2 concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with condition H 1 and H8.	WAC 173-400-040 (6)
	E 19	NOx	Emissions of NOx shall not exceed 83 ppm corrected to 3% oxygen at 1500 – 1600 Deg. F	Intalco shall conduct a source test on each MHD furnace at startup and on alternating MHD furnaces once every five years during full operation using EPA RM 7E for NOx and RM 3A for Oxygen as per 40 CFR Part 60, Appendix A, or another EPA approved method. Intalco shall comply with Condition E20 and H14.	DE 02AQIS-3967
	E 20	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the furnaces that, at a minimum, includes a visual check for visible emissions. Intalco shall record the observations in the emission unit's inspection log. If visible emissions are present or another problem is observed, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log. Taking a corrective action shall include but not be limited to preparing a work order, ordering parts, shutting down the unit, or completing the repair that eliminates the respective problem. Corrective actions shall be taken by employees or contractors designated by Intalco.	DE 02AQIS-3967

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
271 Inert Dross Cooling and Handling System	E 21	Dross storage	Intalco shall limit storage of dross to only the casthouse building extension.	Intalco shall comply with Condition E23.	Order No. 02AQIS-3967
	E 22	Opacity	Opacity shall not exceed 5% for more than six minutes in any sixty minute period.	Intalco shall conduct source tests upon Ecology's request using EPA RM 22 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall comply with Conditions H1 and E23.	
	E 23	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the system that, at a minimum, includes a visual check for visible emissions. Intalco shall record the observations of the parameters assessed in the inspection log. Any time visible emissions are present, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log.	
314 Homogenization Furnace	E 24	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall determine and demonstrate compliance with the emission limit by using natural gas consumption to calculate particulate emissions. Intalco shall calculate worst-case particulate emissions by using an AP-42 emission factor (7.6 pounds PM <sub>10</sub> /1e+6 cubic feet of natural gas from Section 1.4, Small Industrial Boilers) for particulate generated from natural gas combustion, the volume of natural gas combusted by the furnace, and the furnace design excess air settings. Intalco shall report the PM emissions from the furnace in the respective monthly air monitoring report submitted to Ecology. Intalco shall comply with Conditions H1 and E28.	WAC 173-400-050 (1) & WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	E 25	Opacity	Opacity shall not exceed 5% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.b, and E28.	DE 02AQIS-3967
	E 26	SO <sub>2</sub>	SO <sub>2</sub> concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with condition H 1 and H8.	WAC 173-400-040 (6)
	E 27	NO <sub>x</sub>	Emissions of NO <sub>x</sub> shall not exceed 83 ppm corrected to 3% oxygen	Intalco shall conduct an annual source test on the furnace during full operation using EPA RM 7E for NO <sub>x</sub> and RM 3A for Oxygen as per 40 CFR Part 60, Appendix A, or another EPA approved method. Intalco shall comply with Condition E27 and H14. Intalco can reduce the frequency of source testing to once every 5 years if condition H6 is met.	DE 02AQIS-3967
	E28	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the furnace that, at a minimum, includes a visual check for visible emissions. Intalco shall record the observations of the parameters assessed in the inspection log. Any time visible emissions are present, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log.	DE 02AQIS-3967

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
315 Dross/Silicon Storage Baghouse (55,000 acfm)	E 29	PM	Emissions of PM shall not exceed 0.005 grains/dscf.	Intalco shall conduct a source test upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall comply with Conditions H1, E31, and H14.	DE 02AQIS-3967
	E 30	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and E31.	See Condition H3.a.
	E 31	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the baghouse, that, at a minimum, includes a visual check of the following parameters: visible emissions, leaks in ductwork and housing, excess vibration, and pressure drop. Intalco shall record the observations of the parameters assessed in the inspection log. Any time visible emissions are present, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log.	DE 02AQIS-3967
Conditions E32 through E55 incorporate MACT requirements published in Federal Register, March 23, 2000.					
Remelt Furnace 217; Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, and 19; and the MHD Holding Furnaces: 220a, 220b, 221a, 221b	E 32	PM and HCL	For a group 1 furnace that is not a melting/holding furnace processing only clean charge, emissions of PM shall not exceed: 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge. For a group 1 furnace that is not a melting/holding furnace processing purchased scrap charge, emissions of HCl shall not exceed: 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge.	Intalco shall determine compliance with the PM, HCl, and D/F emission limits for individual furnaces. Intalco shall submit a site-specific test plan meeting the requirements of 40 CFR 63.6 and conduct a performance test once every five years using the procedures in the approved site specific test plan to demonstrate compliance with applicable emission limits. Intalco shall use equation 7 in 40 CFR Part 63.1513(b) to determine compliance with the emission limits for PM, HCl, and D/F.	40CFR 63.1505(i)(1); 40CFR 63.1505(i)(4); 40CFR 63.1505(i)(6); 40CFR 63.1505(k)(4); 40 CFR Part 63.1511(a); 40 CFR Part 63.1510(c); 40 CFR Part 63.1510(d); 40 CFR Part 63.1510(e); 40 CFR Part 63.1510(f); 40 CFR Part 63.1510(u); 40 CFR Part 63.1513(b)
Remelt Furnace 217	E 33	Dioxin/Furan (D/F)	For a group 1 furnace that is not a melting/holding furnace processing purchased scrap charge, Intalco must not exceed: 15 µg of D/F TEQ per Mg.		40CFR63.1505(i)(3); 40CFR63.1505(k)(4); 40 CFR Part 63.1510(u)
	E34	Scrap Inspection Program	Intalco shall comply with the Scrap Inspection Program outlined in Intalco's OM&M plan.		40CFR 63.1510(p)



II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, and 19	E 35	Solid Reactive Flux	Intalco shall use solid reactive flux in the holding furnaces only.	Intalco shall measure and record the weight and time of solid reactive flux addition to the holding furnaces	40CFR 63.1506(n)
	E 36	Operation and Maintenance of Group 1 Furnaces without Add-On Control Devices	Intalco must, for each group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices: 1) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test. 2) Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the current version of the OM&M plan.	Intalco must, for each group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices: 1) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test. 2) Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the current version of the OM&M plan.	40CFR63.1506(n)
			3) Operate each group 1 melting/holding furnace subject to the emission standards in §63.1505(i)(2) using only clean charge as the feedstock.	3) Operate each group 1 melting/holding furnace subject to the emission standards in §63.1505(i)(2) using only clean charge as the feedstock.	
	E37	Clean charge certification for Group 1 furnace subject to the emission standards in §63.1505(i)(2) using only clean charge as feedstock		Intalco shall submit a certification of compliance with the applicable operational standard for clean charge materials in §63.1506(n)(3) for each 6-month reporting period. Each certification must contain the information in §63.1516(b)(2)(iv).	

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
6 In-fluxers in Casting Pits 1-6	E 38	PM	For an in-line fluxer that uses reactive flux material, Intalco shall not exceed: 0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge.	Intalco shall assume that all chlorine added to the in-line fluxers is converted to HCl and 1000 pounds of PM are assumed to be emitted for every ton of chlorine gas added to the in-line fluxers (per Compilation of Air Pollutant Emission Factors, AP-42, fifth Edition, Volume 1 (Stationary Point and Area Sources) Section 12.8: Secondary Aluminum Operations.)" Intalco shall comply with procedures and conditions in the approved OM&M Plan to demonstrate compliance with applicable emission limits.	40CFR 63.1505(j)(2); 40 CFR Part 63.1510(u)
	E 39	HCl	For an in-line fluxer that uses reactive flux material, Intalco must not exceed: 0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge.		40CFR63.1505(j)(1)
	E 40	Inline Fluxer Compliance	Intalco shall determine compliance with the PM and HCl emission limits for in-line fluxers.	Intalco shall measure the rate of reactive gas flux addition to the in-line fluxer and assume that all reactive flux added to the in-line fluxer is emitted as HCl.	40CFR63.1512(h)(2)
	E41	Reactive Flux Use	Intalco shall use reactive gas flux in the in-line fluxers only.	Intalco shall record and report any reactive gas flux used in in-line fluxers.	
	E42	Chlorine Flux Injection Rate		Intalco shall continuously measure and record the weight of gaseous reactive flux injected for each 15 minute period, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous reactive flux in the in-line fluxers.	40 CFR Part 63.1512(o)

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Remelt Furnace 217, Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 MHD Furnaces 6 In-fluxers in Casting Pits 1-6	E 43	Labeling	Intalco must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace and in-line fluxer as described in 40 CFR 63.1515(b)(3) that identifies the applicable emission limits and means of compliance, including:	Intalco must inspect the labels for each group 1 furnace, group 2 furnace and in-line fluxer at least once per calendar month to confirm that posted labels as required by the operational standard in §63.1506(b) are intact and legible.	40CFR63.1506(b); 40CFR63.1510(c); 40CFR63.1512(r)
			(1) The type of affected source or emission unit (e.g., group 1 furnace, group 2 furnace, in-line fluxer).		
			(2) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.		
	E44	Production Weight	For each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge, Intalco shall: (1) Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test (except as provided in paragraph (3) of this Requirement); (2) Operate each weight measurement system or other weight determination procedure in accordance with the current version of the OM&M plan; (3) Intalco may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and (ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum	For each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or ug/Mg (gr/ton) of feed/charge Intalco must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. (1) The accuracy of the weight measurement device or procedure must be +/-1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.	40CFR63.1506(d) and 1510(e)
			production weight rather than feed/charge weight.	(2) Intalco must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.	

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Remelt Furnace 217, Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 6 In-fluxers in Casting Pits 1-6	E 45	Corrective Action		Intalco shall take corrective action, when a process parameter deviates from the value or range established during the performance test and incorporated in the current approved OM&M plan, as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include the follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation. Intalco shall comply with the corrective action procedures in the current Ecology approved OM&M Plan.	40CFR63.1506(p)
	E 46	Operation, Maintenance, and Monitoring (OM&M) Plan		Intalco shall comply with the provisions of the current approved OM&M plan and update the OM&M plan as necessary for each affected source and emission unit.	40CFR63.1510(b)
	E 47	Weight measurement device (this condition does not apply to the remelt furnace).	Intalco shall operate and maintain a device to continuously measure and record the weight of gaseous or solid reactive flux injected to each affected source or emission unit.	<p>1) The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. 2) Intalco shall assure that the accuracy of the weight measurement device is +/-1 percent of the weight being measured by using the following. a) solid flux vendor certification that the weight of solid flux in each package has been measured to an accuracy of +/- 1% as an alternative measurement system (Ecology approved). and b) a reactive gas flux flow monitor with an accuracy of +/-1% of the full scale of the measuring device as an alternative to +/-1% accuracy of the actual flow measurement (Ecology approved).</p> <p>3) Intalco shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration is specified, at least once every six months. 4) Intalco shall, for each operating cycle or time period used in the performance test, calculate and record the gaseous or solid reactive flux injection rate using the procedure in 40 CFR Part 63.1512(o) or an EPA approved alternative as authorized in 40 CFR 63.1510(j)(5)).</p> <p>5) Intalco shall record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of: (i) Gaseous or solid reactive flux other than chlorine; and (ii) Solid reactive flux.</p>	40CFR63.1510(j)

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Remelt Furnace 217, Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 6 In-fluxers in Casting Pits 1-6	E 48	Test Methods		Intalco shall use following EPA methods (from appendix A of 40 CFR part 60) or EPA approved alternatives to determine compliance with the applicable emission limits or standards: (1) Method 1 for sample and velocity traverses. (2) Method 2 for velocity and volumetric flow rate. (3) Method 3 for gas analysis.(4) Method 4 for moisture content of the stack gas. (5) Method 5 for the concentration of PM. ( 6) Method 9 for visible emission observations. (7) Method 23 for the concentration of dioxins and furans. (8) Method 25A for the concentration of THC (see definition in the glossary), as propane.	40CFR63.1511(c) 40CFR 63.1511(d)
	E 49	Compliance Information	If the group 1 furnace processes only clean charge, Intalco must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. Each test must be conducted while the group 1 furnace (including a melting/holding furnace) processes only clean charge. Intalco may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.	Intalco shall demonstrate compliance in accordance with the site specific monitoring plan submitted per §63.1510(o).	40CFR63.1512(e)(2)
	E 50	Startup, Shutdown, and Malfunction Reports		Intalco shall record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the current version of the SS&M Plan as described in §63.6(e)(3).	40 CFR Part 63.1516(a)

II E METAL PRODUCTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Remelt Furnace 217, Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 6 In-fluxers in Casting Pits 1-6	E 51	Semiannual Reports and Excess Emissions Reports		<p>Intalco shall submit semiannual reports within 60 days after the end of each 6-month reporting period. Each report shall contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, Intalco shall submit a report stating that no excess emissions occurred during the reporting period. Intalco shall submit an excess emissions report if any of the following occur during a 6-month reporting period: 1) An excursion of a compliant process or operating parameter value or range (e.g. total reactive chlorine flux injection rate, definition of acceptable scrap, or other approved operating parameter). 2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in §63.6(e)(3). 3) An affected source was not operated according to the requirements of this subpart. Intalco shall submit semiannual reports within 60 days after the end of each 6-month period. Intalco shall submit the information specified in §63.10(c). When no deviations of parameters have occurred, Intalco shall</p> <p>state in the semiannual report that no excess emissions occurred during the reporting period.</p>	40 CFR Part 63.1516(b)(1); 40 CFR 63.10©; 40 CFR 63.10(e)(3)
	E52 (in-line fluxers are not subject to this condition)	Certifications		<p>Intalco shall include in each report each of these certifications, as applicable: (iv) For each group 1 holding furnace: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in Sec. 63.1505(i)(2) processed only clean charge during this reporting period." (v) For each group 2 furnace: "Only clean charge materials were processed in any group 2 furnace during this reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during this reporting period."</p>	40 CFR Part 63.1516(b)(2)(iv) and (v)
	E53 (in-line fluxers are not subject to this condition)	Performance tests		Intalco shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.	40 CFR Part 63.1516(b)(3)

**II E METAL PRODUCTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Remelt Furnace 217, Holding Furnaces: 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19 6 In-fluxers in Casting Pits 1-6	E54	Annual Compliance Certification		Intalco shall certify continuing compliance based upon the following conditions:(1) Any period of excess emissions, as defined in 40CFR Part 63.1516(b)(1), that occurred during the year were reported as required by this subpart; and (2) All monitoring, recordkeeping, and reporting requirements were met during the year in an annual compliance certification submitted to Ecology no later than January 31 of the following year.	40 CFR Part 63.1516(c)
	E55	Records		Intalco shall maintain records in accordance with §63.10(b) for at least 5 years.	40 CFR Part 63.1517 (a); 40 CFR Part 63.1517 (b)(5); 40 CFR Part 63.1517 (b)(7);40 CFR Part 63.1517 (b)(8);40 CFR Part 63.1517 (b)(9);40 CFR Part 63.1517 (b)(13);40 CFR Part 63.1517 (b)(15);40 CFR Part 63.1517 (b)(16);40 CFR Part 63.1517 (b)(17); 40 CFR Part 63.10(b)

**II F ANCILLARY**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
195 Primary WTP Kiln Wet Scrubber (2,700 acfm)	F1	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.e and F23.	See Condition H2.e
	F2	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a and F23.	See Condition H3.a
	F3	SO <sub>2</sub>	SO <sub>2</sub> concentration shall not exceed 1000 ppm corrected to 7% oxygen based on the average of any period of 60 consecutive minutes.	Intalco shall comply with condition H 1, H 8 and F23.	WAC 173-400-040 (6)
207 Annex Paste Plant Baghouse Stack (5,550 acfm)	F4	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.e and F23.	See Condition H2.e
	F5	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F24.	See Condition H3.a.
208 Ladle Cleaning Baghouse (14,100 acfm)	F6	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g and F24.	See Condition H2.g
	F7	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3, and F24.	See Condition H3.a.

II F ANCILLARY (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
209 Autogenous Mill Baghouse (45,000 acfm)	F8	PM	Emissions of PM shall not exceed 5.0 tons of PM per year.	Intalco shall conduct a source test once every 5 years and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall include the results of the source test in the respective monthly air monitoring report submitted to Ecology. Intalco shall comply with Condition F12.	Order DE02AQIS-3967
	F9	PM	Emissions of PM shall not exceed 0.01 grains per dscf.		Order DE02AQIS-3967
	F10	Opacity	Opacity shall not exceed 5% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.b, and F12.	Order DE02AQIS-3967
	F11	TF	Emissions of TF shall not exceed 2.7 tons per year.	Intalco shall conduct source tests once every 5 years and upon Ecology's request using EPA RM 5/13B as per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall comply with condition F12.	Order DE02AQIS-3967
	F12	Functional Integrity	Inspection	Intalco shall conduct a weekly functional integrity inspection of the baghouse, that, at a minimum, includes a visual check of the following parameters: visible emissions, leaks in ductwork and housing, excess vibration, and pressure drop. Intalco shall record the observations of the parameters assessed in the inspection log. Any time visible emissions are present, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log.	Order DE02AQIS-3967



II F ANCILLARY (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
214 Alumina Ore Silo #4 Rail Car Unloader Baghouse Stack (19,600 acfm)	F13	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and F24.	WAC 173-400-060 & WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
	F14	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F24.	See Condition H3.a.
216 Alumina Ore Ship Unloading Baghouse Stack (15,000 acfm)	F15	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and F24.	Same Authority as Condition F13.
	F16	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F24.	See Condition H3.a.
229 Brick Crushing Facility Baghouse Stack (20,000 acfm)	F17	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and F24.	Same Authority as Condition F13.
	F18	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F24.	See Condition H3.a.
274 Alumina Silo #4 Truck Loader Baghouse Stack (5,000 acfm)	F19	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g and F24.	See Condition H2.g
	F20	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F24.	See Condition H3.a.
280 Annex Cathode Assembly Area Roof Vents	F21	PM	Emissions of PM shall not exceed 0.1 grains/dscf.	Intalco shall comply with Conditions H1, H2.g, and F25.	Same Authority as Condition F13.
	F22	Opacity	Opacity shall not exceed 20% for more than six minutes in any sixty minute period.	Intalco shall comply with Conditions H1, H3.a, and F25.	See Condition H3.a.
195 Primary Waste Treatment Plant (PWTP) Kiln Wet Scrubber	F23	Functional Integrity	Inspection	Intalco shall comply with Condition H4.g	See Condition H4.g
Emission Units #'s: 207, 208, 209, 210, 214, 216, 229 and 274	F24			Intalco shall comply with Condition H4.a	See Condition H4.a
Emission Unit #: 280	F25			Intalco shall comply with condition H4.c.	See Condition H4.c
II G MAINTENANCE					
308 Paint Shop	G1	VOC	Recordkeeping	Intalco shall track VOC usage through purchase records or other methods approved by Ecology. Intalco shall report annual VOC usage in the December Air Monitoring Report submitted to Ecology.	WAC 173-415-060(2) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).

II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
All emission units and control systems on Intalco's facility	H1	Operation and Maintenance (O&M)	At all times, including periods of abnormal operation and upset, Intalco shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, visible emission observations, inspections of the source, and reviews to determine that the plant is following its O & M procedures.	Intalco shall comply with applicable PM and Opacity monitoring requirements in the respective unit specific conditions and the applicable Functional Integrity Inspection requirements in Condition H4 for the affected emission unit or emission control.	WAC 173-415-030(6) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
Emission units that are subject to grainloading requirements	H2	PM	PM Limit (see individual emission unit for the limit).	H2.a Intalco shall conduct a source test annually and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source test in the respective monthly air monitoring report submitted to Ecology per Condition H14.	WAC 173-400-060 [effective 3/22/91; approved into the SIP on 8/20/93] WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
				H2.b Intalco shall conduct a source test once every two years and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source test in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Order DE 02AQIS-3967 WAC 173-400-050 (1) [effective 3/22/91; approved into the SIP on 8/20/93] WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
				H2.c Intalco shall conduct a source test once every two years and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source test in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Same authority as for Condition H2.a.
				H2.d Intalco shall conduct a source test every two years on alternating holding furnaces during full operation and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source tests in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Same authority as for Condition H2.a.

**II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Emission units that are subject to grainloading requirements	H2 (continued)	PM (continued)		H2.e Intalco shall conduct a source test once every 5 years and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source test in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Same authority as for Condition H2.a.
				H2.f Intalco shall conduct a source test on each MHD furnace after each furnace is put back into operation and then conduct source tests once every five years on alternating MHD furnaces during full operation and upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source tests in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Same authority as for Condition H2.a.
				H2.g Intalco shall conduct a source test upon Ecology's request using EPA RM 5 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall submit the results of the source test in the respective monthly air monitoring report submitted to Ecology per Condition H14.	Same authority as for Condition H2.a.
Emission units subject to an opacity limit	H3	Opacity	Opacity shall not exceed an average of 20% for more than six consecutive minutes in any sixty minute period.	H3.a Intalco shall conduct source tests upon Ecology's request using EPA RM 9 per 40 CFR 60, Appendix A, or another EPA approved method. If visible emissions are observed at any time, Intalco shall comply with Condition H5.	WAC 173-415-030 (3) [approved into the SIP on 2/19/91; state rule effective 3/22/91] WAC 173-400-040(1) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
			Opacity shall not exceed an average of 5% for more than six consecutive minutes in any sixty minute period.	H3.b Intalco shall conduct source tests upon Ecology's request using EPA RM 9 per 40 CFR 60, Appendix A, or another EPA approved method. If visible emissions are observed at any time, Intalco shall comply with Condition H5.	Order No. 02AQIS-3967
Emission units that are subject to a functional integrity inspection	H4	Functional Integrity (FI)	Inspection	H4.a Intalco shall conduct a weekly functional integrity inspection of the baghouse, that, at a minimum, includes a visual check of the following parameters: visible emissions, leaks in ductwork and housing, excess vibration, and pressure drop. Intalco shall comply with Condition H5.	WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
				H4.b Intalco shall continuously monitor coke and air flow in accordance with 40 CFR 63.848(f)(1) and conduct a daily visible emission check and a weekly functional integrity inspection that, at a minimum, includes a visual check of the following parameters: visible emissions, leaks, pump outlet pressure, and amperage to recirculation pumps. Intalco shall comply with Condition H5.	Order No. 02AQIS-3967
				H4.c Intalco shall conduct a weekly functional integrity inspection of the vents that, at a minimum, includes a visual check of visible emissions. Intalco shall comply with Condition H5.	Same authority as Condition H4.a

**II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Emission units subject to a functional integrity inspection	H4 (continued)	FI (continued)	Inspection (continued)	H4.d Intalco shall conduct a daily functional integrity inspection of the potroom baghouses that, at a minimum, includes a visual check of the following parameters: visible emissions, leaks in ductwork and housing, excess vibration, pressure drop, and sight glass readings. Intalco shall comply with Condition H5.	Order No. 02AQIS-3967
				H4.e Intalco shall conduct a weekly functional integrity inspection of all the pot hoods. During that inspection, Intalco shall classify the condition of each hood as good, fair, or poor. Intalco shall direct hood repair crews to begin the repair process for the poor condition hoods during their first shift after the inspection. Hoods classified as fair shall be repaired within 15 days. Intalco shall conduct a daily functional integrity inspection of the potroom wet scrubbers that, at a minimum, includes a visual check of the following parameters: visible emissions (per 40 CFR 63.848(g) Primary Aluminum MACT), processing adequate volumes of water and air (per Condition 40 CFR 60.848(f)(5)(Primary Aluminum MACT)). Intalco shall comply with Condition H5.	Order No. 02AQIS-3967
				H4.f Intalco shall conduct a weekly functional integrity inspection of the furnaces that, at a minimum, includes a visual check of visible emissions. Intalco shall comply with Condition H5.	Same authority as Condition H4.a
				H4.g Intalco shall conduct a weekly functional integrity inspection of the PWTP kiln wet scrubber that, at a minimum, includes a visual check of the following parameters: visible emissions, processing adequate volumes of water and air. Intalco shall comply with Condition H5.	Same authority as Condition H4.a
				H4.h Intalco shall conduct a weekly functional integrity inspection of the baghouse that , at a minimum, includes a visual check of the following parameters: visible emissions, leaks in ductwork and housing, and excess vibration. Intalco shall comply with Condition H5.	Same authority as Condition H4.a

**II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
All emission units and control systems subject to an opacity limit and those subject to functional integrity inspections.	H5	Recording Inspections and taking Corrective actions	Recording Inspections and taking Corrective actions	Intalco shall record the observations and readings of the parameters assessed (e.g., amperage to recirculation pumps on the PFTS) in the emission unit's inspection log. If visible emissions are present or another problem is observed, Intalco shall take corrective action as soon as practical but within 24 hours. Intalco shall record the results of corrective actions taken in the inspection log. Taking a corrective action shall include but not be limited to preparing a work order, ordering parts, shutting down the unit, or completing the repair that eliminates the respective problem. Corrective actions shall be taken by employees or contractors designated by Intalco.	WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
Emission units subject to source testing requirements to determine compliance with an emission limit.	H6	Monitoring Frequency Reduction	Monitoring Frequency Reduction	Intalco can reduce monitoring frequencies to the frequencies defined in the respective unit specific conditions if each of three consecutive source tests demonstrates that the emission rate is < 75% of the applicable limit. Intalco shall resume the original source testing frequency any time a source test demonstrates emissions have increased above 75% of the applicable limit. Intalco shall submit a letter notifying Ecology that the monitoring frequency will be reduced. The notification shall demonstrate the justification for the reduced monitoring frequency and schedule. Intalco shall submit the notification to Ecology within 60 days after the last source test used to make the demonstration.	WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
247 Plantwide Sulfur Dioxide Emissions (generation points are the aluminum reduction pots, anode bake ovens, green carbon heaters and mixers, emergency generators, and natural gas combustion units)	H7	SO <sub>2</sub>	Total emissions of SO <sub>2</sub> from all emissions units shall not exceed thirty grams of sulfur dioxide per kilogram of aluminum produced on a monthly average (sixty pounds per ton of aluminum produced).	a. Intalco shall conduct source tests upon Ecology's request using EPA RM 6 per 40 CFR 60, Appendix A, or another EPA approved method. b. Intalco shall determine total facility-wide SO <sub>2</sub> emissions by summing the SO <sub>2</sub> generated from the potlines and the anode bake ovens. Intalco shall calculate SO <sub>2</sub> emissions from the potlines, anode bake ovens, and paste plant by using the mass balance calculation in Condition D16 (using the daily aluminum production rate and average sulfur content for the month being evaluated). Intalco shall assume, in the mass balance calculation, that 100% of the sulfur in coke and raw materials converts to SO <sub>2</sub> . Intalco shall calculate the SO <sub>2</sub> generated by natural gas combustion using an Ecology approved emission factor as described in Condition H13.	WAC 173-415-030(5)(a) WAC 173-400-040(6) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
				c. Intalco shall report the aluminum production; SO <sub>2</sub> emissions in pounds per ton of aluminum produced, the sulfur content of the coke and pitch, raw material usage, representative raw material sulfur analysis and any exceedences of the SO <sub>2</sub> limits in the monthly air monitoring reports submitted to Ecology. d. Intalco shall maintain electronic records of aluminum production, SO <sub>2</sub> emissions in pounds per ton of aluminum produced, the sulfur content of the coke and pitch, raw material usage, and representative raw material sulfur analysis of raw material usage for a minimum of 5 years.	

II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)					
Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
All emission units subject to the 1000 ppm limit in WAC 173-400-040(6) and WAC 173-415-030(5)(b)	H8	SO <sub>2</sub>	Intalco shall not cause or permit the emission of a gas containing sulfur dioxide in excess of one thousand parts per million corrected to dry standard conditions for an hourly average.	Intalco shall conduct source tests upon Ecology's request using EPA RM 6 per 40 CFR 60, Appendix A, or another EPA approved method. Intalco shall comply with condition H7.	WAC 173-415-030(5)(b) WAC 173-400-040(6) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
Emission Units 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19, 22-180, 181-186, 187, 195, 198, 199, 209, 210, 220a,b, 221a,b, 240, 251, 251, 253, 257a,b, 259a,b, 295, 296, 316	H9	Fluoride emissions. (State Only)	The emissions of gaseous fluoride and the forage fluoride content shall not exceed the respective ambient and forage fluoride standards in WAC 173-481-110 (2) (a) through (e) and WAC 173-481-100 (2)(a) through 2(c).	<p>Intalco shall:</p> <p>a. Intalco shall continue to monitor ambient fluoride at the monitoring station identified as station #2 continuously for 24 hours a day every day of the year in accordance with the Fluoride Ambient Monitoring procedures outlined in Intalco's approved Air Monitoring Plan. Station #2 is located at Latitude 48 degrees 50 minutes 44 seconds and Longitude 122 degrees 41 minutes 35 seconds (approximately 1.05 miles East Northeast of the center of the potlines). Intalco will keep stations 1 and 5 in place. Ambient fluoride monitoring is not required at stations 1 and 5.</p> <p>b. . Intalco shall continue monitoring ambient fluoride at the ambient monitoring station for a minimum period of 60 days after a shutdown of all potlines.</p> <p>c. Intalco shall report the data collected from the ambient monitoring station in the respective monthly air reports submitted to Ecology. Intalco shall report the ambient data in a format that will allow a comparison of the data to the ambient fluoride standards in WAC 173-481-110 (2)(a) through 2(e).</p> <p>d. . Intalco shall determine the mass of gaseous fluoride emitted per day (pounds/day) from the facility (averaged on a monthly basis). Intalco shall report the average pounds of gaseous fluoride emitted from the facility per day in the respective monthly air monitoring report submitted to Ecology.</p> <p>e. Intalco shall follow the approved forage sampling and analysis plan in Intalco's approved Air Monitoring Plan.</p> <p>f. Intalco shall continue forage monitoring (per Condition H9.e) through the end of the growing season if a shutdown occurs during the growing season.</p> <p>g. Intalco shall report the forage data collected (in accordance with the Forage Sampling Plan in Intalco's approved Air Monitoring Plan) in the respective monthly air monitoring reports submitted to Ecology. Intalco shall report the data in a format that will allow a comparison of the forage data to the forage standards in WAC 173-481-100 (2)(a) through 2(c).</p>	Order No.DE 03AQIS-5550 WAC 173-415-030(1)(a) and WAC 173-481.

**II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
Emission Units 4, 5, 7, 8, 10, 11, 13, 14, 16, 17, 18, 19, 22-180, 181-186, 187, 195, 198, 199, 209, 210, 220a,b, 221a,b, 240, 251, 251, 253, 257a,b, 259a,b, 295, 296, 316 (continued)	H9	Fluoride emissions. (State Only) continued		<p>h. Intalco shall maintain electronic records of the data collected for compliance with the conditions above for a minimum of 5 years.</p> <p>i. Ecology may impose additional requirements if Intalco's gaseous fluoride or forage monitoring results exceed the standards in WAC 173-481.</p> <p>j. Intalco shall develop and submit to Ecology a draft Air Monitoring Plan containing the procedures for ambient fluoride and forage fluoride content monitoring outlined in the conditions H9.a - H9.h above for review within 60 days of issuance of this order. Ecology shall provide comment and approve a plan that meets the requirements of this order within 60 days of receipt of the plan. Intalco shall implement all requirements of the plan within 60 days of Ecology's approval. Prior to implementing any changes to the procedures outlined in the approved Air Monitoring Plan, Intalco shall submit a written request and receive Ecology's approval for the changes. Intalco shall develop and submit to Ecology an updated Air Monitoring Plan containing the procedures for ambient fluoride and fluoride forage monitoring outlined in the conditions above within 60 days of issuance of this order for review and approval. Intalco shall implement all requirements of the plan within 60 days of Ecology's approval. Prior to implementing any changes to the procedures outlined in the approved Air Monitoring Plan. Intalco shall submit a written request and receive Ecology's approval for the changes.</p>	Order No.DE 03AQIS-5550 WAC 173-415-030(1)(a) and WAC 173-481.
235 Plantwide Usage of VOC Containing Products	H10	VOC	Recordkeeping and Reporting	Intalco shall track VOC usage through purchase records. Intalco shall report VOC usage annually in the December Air Monitoring Report per Condition H14.	WAC-173-415-060(2)
<p>239 (Fugitive Dust from Vehicle Traffic on Paved Roads); 240, 295, and 296 (Landfill Fugitive Emissions); 252 (Anode Block Hole Blower); 257a&amp;b (Crust Recovery Discharge to Truck from Bins 1 &amp; 2);</p> <p>259a&amp;b (Carbon Recovery Discharge to Truck from Bins 1 &amp; 2); 275 (Aluminum Fluoride/Anthracite Railcar Unloading Fugitive Dust); 276 (Coke Unloading and Transfer Fugitive Dust); 306 (Alumina Ore Ship Unloader Clamshell); 312 (Rod Shop Induction Furnace (East))</p> <p>313 (Rod Shop Induction Furnace (West)).</p>	H11	Fugitive Emissions	Intalco shall use RACT to prevent fugitive emissions.	For each of the emission units identified in column 1 of this condition, Intalco shall comply with the reasonable available control technology (RACT) requirements identified in Intalco's Air Monitoring Plan per Condition H15. H11.a For emission unit number 306 (Alumina Ore Ship Unloader Clamshell), Intalco shall limit alumina ore unloading activities to periods when sustained winds are less than 35 mph averaged over a period of 30 minutes.	WAC 173-415-030(4) WAC 173-400-040(3)(a)

**II H FACILITY-WIDE GENERALLY APPLICABLE REQUIREMENTS (continued)**

Emission Unit	Condition No.	Pollutant /Parameter	Requirement	Monitoring, Reporting and Record-keeping	Basis of Authority
241 Plantwide Natural Gas Combustion Emissions	H12	Natural Gas Consumption		Intalco shall maintain electronic records of daily natural gas consumption. Intalco shall report natural gas usage in the monthly Air Monitoring Report per Condition H14.	WAC 173-400-040(3)(a)
	H13	SO <sub>2</sub>	SO <sub>2</sub> emissions from natural gas combustion shall not contribute to an exceedance of the facility wide SO <sub>2</sub> limit in condition H7.	Intalco shall include SO <sub>2</sub> emissions from natural gas combustion to demonstrate compliance with the SO <sub>2</sub> limit in Condition H7. Intalco shall use an Ecology approved natural gas emission factor for SO <sub>2</sub> emissions.	WAC 173-415-030(5)(a) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
All emission units having reporting requirements	H14	Monthly Air Monitoring Report		Intalco shall submit a monthly air monitoring report which contains the respective results of the monitoring required in the conditions of this permit. The report shall be submitted within 30 days of the end of each calendar month. Intalco shall report the data in a format that will allow a comparison of all the data to the respective emission limits. The format shall include a table which summarizes the required source tests conducted during that month and the dates when they were completed. Intalco shall submit the results of source tests to Ecology in the air monitoring report for the month that the results are received by Intalco. Ecology will review the format of the first monthly report submitted after final issuance of this AOP and propose recommendations for revisions if necessary.	WAC 173-415-060(1) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).
All emission units with monitoring requirements	H15	Air Monitoring Plan		Intalco shall update their Air Monitoring Plan (Plan) to include the sampling and source testing procedures and testing frequencies that will be used to determine and demonstrate compliance with the emission limits (including ambient fluoride and fluoride content in forage and Primary and Secondary MACT) in the respective conditions of this AOP. The Plan shall include a section which identifies the individual sources of fugitive emissions (identified in Condition H11) and the RACT procedures that will be used to assure compliance with WAC173-415-030(4). Intalco shall submit the Plan to Ecology within 90 days of final issuance of this AOP for review and approval. Ecology shall approve the plan within 60 days of receipt of the Plan.	WAC 173-415-060(1) WAC 173-401-615(1)(b) (Periodic Monitoring), WAC 173-401-615(2)(a) (Recordkeeping); and WAC 173-401-630(1) (General Compliance Requirements).



SECTION III: STANDARD TERMS AND CONDITIONS OF THE PERMIT			
III.1.	Duty to comply	The permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.	WAC 173-401-620(2)(a)
III.2.	Need to halt or reduce activity not a defense	It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.	WAC 173-401-620(2)(b)
III.3.	Permit actions	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.	WAC 173-401-620(2)(c)
III.4.	Property rights	This permit does not convey any property rights of any sort, or any exclusive privilege.	WAC 173-401-620(2)(d)
III.5.	Duty to Provide Information	The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.	WAC 173-401-620(2)(e)
III.6.	Permit fees	The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW.	WAC 173-401-620(2)(f)
III.7	Emissions Trading	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.	WAC 173-401-620(2)(g)
III.8	Severability Clause	If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.	WAC 401-620(2)(h)
III.9	Permit Appeals	The permittee may appeal this permit or any conditions in it only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.	WAC 173-401-620(2)(i)
III.10	Permit Continuation	This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted.	WAC 173-401-620(2)(j)
III.11	Federally Enforceable Requirements	All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable by EPA and citizens under the FCAA, unless they are specifically designated as not federally enforceable.	WAC 173-401-625
III.12	Reopening for Cause	<p>This permit shall be reopened and revised under any of the following circumstances:</p> <p>(a) Additional applicable requirements become applicable when the remaining permit term is greater than three years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated in the permit.</p> <p>(c) Ecology determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or</p> <p>(d) Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirement. Procedures to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.</p>	WAC 173-401-730
III.13	Tampering and False Statements	No person shall make any false materials statement, representation or certification in any form, notice or report required in this permit. No person shall render inaccurate any monitoring device or method required under this permit.	WAC 173-400-105(7) and (8) and 40 CFR 70.11(a)

SECTION IV: GENERAL TERMS AND CONDITIONS OF THE PERMIT			
Recordkeeping Terms & Conditions			
IV.1	Monitoring Records	The permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable: (i) The date, place as defined in the permit, and time of sampling or measurements; (ii) The date(s) analyses were performed; (iii) The company or entity that performed the analyses; (iv) The analytical techniques or methods used; (v) The results of such analyses; and (vi) The operating conditions existing at the time of sampling or measurement.	WAC 173-401-615(2)(a) and WAC 173-400-105
IV.2	Inspection Checklists	Where the permittee is required to use and maintain an inspection checklist, the checklist must contain, at a minimum, the following information: (i) The person conducting the inspection; (ii) The date/time of the inspection; (iii) Location of the inspection; (iv) The observations made during the inspection; (v) Corrective actions taken if any; (vi) The date and time corrective action was initiated and completed.	WAC 173-401-615(1)(b)
IV.3	Changes at Source	The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.	WAC 173-401-615(2)(b)
IV.4	Records Retention	The permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all data from continuous monitoring instrumentation, and copies of all reports required by this permit.	WAC 173-401-615(2)(c)
IV.5	Recording of Permit Deviation	The source shall maintain a contemporaneous record of all deviations including the date and nature of the deviation.	WAC 173-401-615(3)(b)
Reporting Terms & Conditions			
IV.6	Certifications	Any application form, report, or compliance certification submitted pursuant to Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 173-401 WAC shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	WAC 173-401-520
IV.7	Monthly Reports	Results of monitoring shall be reported within 30 days of the last calendar day of each month. All instances of deviations from permit requirements must be clearly identified in such reports.	WAC 173-401-615(3)(a) and WAC 173-415-060
IV.8	Permit Deviations/Excess Emissions	The permittee shall promptly submit a report of any deviations from permit conditions. A. For purposes of this permit, submitting a report "promptly" means the following: (1) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (2) for other deviations, "promptly" means that the deviations are identified in the respective monthly report. B. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107.	WAC 173-401-615(3)(b) and WAC 173-400-107
IV.9	Emission Inventory	The permittee shall submit an inventory of emissions, as specified in WAC 173-415-080, from the source each year no later than 105 days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions.	WAC 173-415-080 and WAC 173-400-105(1)
IV.10	Compliance Requirements/Certification	A. The permittee shall continue to comply with applicable requirements with which the permittee is in compliance; B. The permittee shall meet applicable requirements that will become effective during the permit period. C. The permittee shall submit a report to the Department of Ecology and to Region 10 of EPA within 105 days after the close of the calendar year, and every year thereafter, certifying compliance with the terms and conditions contained in this permit for the previous calendar year. The initial compliance certification shall cover the period from when the permit is effective to the end of the calendar year. The certification shall describe the following: i. the permit term or condition that is the basis of the certification; ii. the compliance status; iii. whether compliance was continuous or intermittent; and iv. the methods used for determining compliance [WAC 173-401-630(5)]. The compliance status shall be based on compliance with the final averaging period of the annual certification period. Determination of continuous or intermittent compliance shall be based on compliance during the entire annual certification period. The Permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d)]	WAC 173-401-510(2)(h)(iii), WAC 173-401-600, WAC 173-401-630(3), and WAC 173-401-630 (5)
IV.11	Report Address	All reports, renewal applications, and compliance certifications required by this permit shall be submitted to: Department of Ecology, Industrial Section, P.O. Box 47706, Olympia, WA 98504-7706.	
		Compliance certification shall also be submitted to: Environmental Protection Agency, Air Operating Permits, Region 10, 1200 Sixth Avenue, OAQ-108, Seattle, Washington 98101-1128.	

Other Terms & Conditions of the Permit			
IV.12	Asbestos	The permittee shall comply with 40 CFR Part 61, subpart M (asbestos NESHAP) and WAC 173-400-075 when conducting any renovation or demolition at the facility.	WAC 173-400-075
IV.13	Concealment and Masking	The permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit.	WAC 173-400-040(7)
IV.14	Inspection and Entry	Inspection and entry. The permittee shall allow the permitting authority or an authorized representative to perform the following upon presentation of credentials and other documents as may be required by law: (a) Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit; (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit; (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and (d) As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.	WAC 173-401-630(2)
IV. 15	Application and Issuance of a Renewal Permit	The permittee shall submit a complete permit renewal application to Ecology no later than six months, but no earlier than 18 months, prior to the expiration date of the existing permit. Permits being renewed are subject to the same procedural requirements, including those for public participation, affected state and EPA review that apply to the initial permit.	WAC 173-401-710(1)&(2)
IV.16	Stratospheric Ozone Protection	The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditions (MVACs) in Subpart B: i. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156; ii. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158; iii. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to § 82.161; iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166 ("MVAC-like appliance" is defined at § 82.152.; v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156; Owners/operators of appliances normally containing 50 or more pounds or refrigerant purchased and added to such appliances pursuant to § 82.166."; B. Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SANP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]; C. Any certified technician employed by Permittee shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]; D. The Permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant that would otherwise be released into the atmosphere. [RCW 7070.94.970(2), 970(4)] State Only; E. Compliance with this term and condition will be demonstrated by using a certified contractor or employee.	40 CFR Section 82 and RCW 70.94.970 (the RCW is a state-only requirement)
IV.17	Insignificant Emission Units	The generally applicable requirements that apply to IEUs are, WAC 173-415-030, WAC 173-400-040, WAC 173-400-050(1) & (3), and WAC 173-400-060.	WAC 173-401-530(2)(b)
IV.18	Providing Additional Data	For Ecology to evaluate a plant's emissions or emission control program, each primary aluminum plant shall furnish other data requested by Ecology.	WAC 173-415-060(2)
IV.19	Section 112(j) Industrial Boiler and Process Heater Phase II MACT Application	On or before April 28, 2004 the Permittee shall file a Part 2 application for a MACT determination, if by that date EPA has not promulgated a generally applicable federal MACT standard for the Industrial Boiler and Process Heater source category. The application need only cover those emission points and hazardous air pollutants that would be subject to control under the MACT standard proposed for comment at 68 Fed.Reg. 1660 (January 13, 2003).	40 CFR 63.50(c) and WAC 173-400-075(5)
<b>SECTION V: PERMIT SHIELD/ INAPPLICABLE REQUIREMENTS</b>			
Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in this permit, as of the date of permit issuance. This permit shield does not exempt the permittee from requirements enacted after the permit issuance date. This permit shield shall not apply to any insignificant emission unit or activity designated under WAC 173-401-530.			
Pursuant to WAC 173-401-640(2), the Department of Ecology has determined that the requirements listed below do not apply to the facility, as of the date of permit issuance, for the reasons specified.			

INAPPLICABLE REQUIREMENTS	
Regulatory Citation	Reason for Inapplicability
40 CFR 60, Subpart S Standards of Performance for Primary Aluminum Reduction Plants	The facility was constructed before October 23, 1974 and was not modified or reconstructed after that date.
RCW 70.94.610 Burning Used Oil Fuel in Land-based Facilities	The facility does not burn used oil.
RCW 70.94.650 Burning Permits for Weed Abatement, Fire Fighting Instruction and Agricultural Activities	The facility does not engage in any of the covered burning activities.
RCW 70.94.743 Outdoor Burning--Areas Where Prohibited	The facility does not conduct outdoor burning
RCW 70.94.775 Outdoor Burning--Fires Prohibited--Exceptions	The facility does not conduct outdoor burning
RCW 70.94.531 Transportation demand management	Alcoa is not in an affected County
WAC173-400-040(8)(b) Fugitive emissions	Facility is not a significant contributor to the non-attainment status of any designated PM-10 non-attainment area.
WAC 173-400-050(2) (9/20/93) Emission Standards for Incinerators	None of the facility's emission units are "incinerators" as that term is defined in WAC 173-400-030.
WAC 173-400-070 Emission standards for certain source categories	None of the listed categories are found at Intalco.
WAC173-400-100 Registration of sources	Not applicable because WAC173-400-101(7) exempts sources subject to operating permit program from registration requirements of WAC173-400-100 through104. (see SIP)
WAC173-040-102 Scope of registration and reporting	Not applicable because WAC173-400-101(7) exempts sources subject to operating permit program from registration requirements of WAC173-400-100 through104.
WAC173-400-103 Emission estimates	Not applicable because WAC173-400-101(7) exempts sources subject to operating permit program from registration requirements of WAC173-400-100 through104.
WAC173-400-104 Registration fees	Not applicable because WAC173-400-104(4) exempts sources subject to interim operating permit fee from paying an interim registration fee.
WAC 173-400-105(5) Continuous monitoring and reporting	None of the listed categories are found at Intalco.
WAC173-400-112 Requirements for new sources in non-attainment areas	Intalco is not located in an non-attainment area.
WAC 173-400-115 Standards of performance for new sources	The facility was constructed before October 23, 1974 and was not modified or reconstructed, as defined by NSPS, after that date.
WAC 173-400-120 Bubble Rules	The facility has not applied for a bubble.
WAC 173-400-131 Issuance of Emission Reduction Credits	The facility has not applied for emission reduction credits.
WAC 173-400-136 Use of Emission Reduction Credits	The facility does not have and has not used emission reduction credits.
WAC173-400-210 Emission requirements	Facility was not regulated by a local air authority.
WAC 173-406 Acid Rain Regulation	Not applicable because Intalco is not an "affected source" within the meaning of WAC 173-406-101(9).
Chapter 173-421 WAC Emission Control Systems	The facility does not perform work on motor vehicle emission systems.
Chapter 173-422 WAC Motor Vehicle Emissions	Not applicable because applicable requirements apply only to "emission units in a Chapter 401 source," per WAC 173-401-200(4), and motor vehicles are not "emission units," as defined in WAC 73-401-200(11).
Chapter 173-425 WAC (9/17/90) Open Burning	The facility's operations do not include open burning.
Chapter 173-430 WAC Agricultural Burning	Not applicable because there are no "agricultural operations," as defined in WAC 173-430-020(1), at Intalco
Chapter 173-433 WAC (9/17/90) Solid Fuel Burning Device Standards	The facility's emission units are not "solid fuel burning devices" as defined in WAC 173-433-030(9).
Chapter 173-434 WAC (9/17/90) Solid Waste Incinerator Facilities	None of the facility's emission units are incinerators burning a solid waste fuel, within the meaning of WAC 173-434-030.
WAC 173-490-030 (2/19/91) Registration and Reporting--Petroleum liquid storage tanks.	The facility does not have any petroleum liquid storage tanks.
WAC 173-490-040(2) (2/19/91) Petroleum Liquid Storage Tanks	The facility does not have any petroleum liquid storage tanks.
WAC 173-490-040(6) (2/19/91) Surface Coaters	It does not apply to any of the emission units at Intalco.
WAC 173-490-040(7) (2/19/91) Open Top Vapor Degreasers	It does not apply to any of the emission units at Intalco.
WAC 173-490-040(8) (2/19/91) Conveyorized Degreasers	It does not apply to any of the emission units at Intalco.

INAPPLICABLE REQUIREMENTS (continued)	
Regulatory Citation	Reason for Inapplicability
WAC 173-490-040(9) (2/19/91) Cutback Asphalt Paving	The facility does not engage in the activity subject to requirements of this subsection.
WAC 173-490-040(10) (2/19/91) Cold Cleaners	It does not apply to any of the emission units at Intalco.
WAC 173-490-080 (2/19/91) Exceptions and Alternative Methods	Subsection (1) not applicable because facility has not applied for an alternative emission reduction method. Subsection (2) The facility does not have a gas-fired incinerator used to comply with the requirements of this chapter.
WAC 173-490-201 (2/19/91) Petroleum Liquid Storage In External Floating Roof Tanks	The facility does not have any petroleum liquid storage tanks.
WAC 173-490-205 (2/19/91) Surface Coating of Miscellaneous Metal Parts and Products	The facility does not engage in the surface coating of metal parts or products.
WAC463-39 EFSEC General regulations	Applies only to facilities under the jurisdiction of EFSEC.
Ecology Order DE 90-1035 Request Air Monitoring Plan	Intalco submitted the Plan in compliance with the requirement. Condition H15 of the AOP requires Intalco to update the plan.
FCAA Title IV, Acid Deposition Control	Not applicable because Intalco has not volunteered to participate.
FCCA section 183(e) Standards for VOC-emitting Products	Not applicable because Intalco is not a "regulated entity" within the meaning of FCAA section 183(e)(1)©, and because EPA has not promulgated any rules under section 183(e) that regulated primary aluminum smelters.
FCCA section 183(f) Tank vessel Standards	Applies only to loading and unloading of marine vessels carrying petroleum products. This activity does not occur at Intalco.
FCCA section 328 Standards to control air pollution from outer continental shelf sources	Not applicable because Intalco is not an "Outer Continental Shelf Source" within the meaning of FCAA section 328(a)(1).
SECTION VI: ABBREVIATIONS	
avg	average
BACT	best available control technology
BTU	British thermal unit
CEM	continuous emission monitor
CO	carbon monoxide
DOE	Department of Ecology
dscf	dry standard cubic foot
D/F	dioxins and furans
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
gpm	gallons per minute
gt&c	general terms and conditions
g/m <sup>3</sup>	grams per cubic meter
gr	grain
HAP	hazardous air pollutant
IEU	insignificant emission unit
kg	kilogram
lbs	pounds
MACT	maximum available control technology
ug/m <sup>3</sup>	micrograms per cubic meter
MMBTU	million British thermal units
NOx	nitrogen oxides
NSPS	new source performance standards
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
POM	polycyclic organic matter
ppm	parts per million
ppmdv	part per million dry volume
PSD	prevention of significant deterioration
RCW	Revised Code of Washington
RACT	reasonable available control technology
SERP	source emission reduction plan
SIP	state implementation plan
SO <sub>2</sub>	sulfur dioxide
THC	total hydrocarbon emissions that also serve as a surrogate for the emission of organic HAP compounds
tpy	tons per year
U.S.C.	United States Code
VOC	volatile organic compound
VE	visible emissions
WAC	Washington Administrative Code